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THOMAS WEISEL PARTNERS LLC and
9 THOMAS WEISEL INTERNATIONAL PRIVATE
LIMITED
10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 THOMAS WEISEL PARTNERS LLC, a
Delaware limited liability company, and
16 THOMAS WEISEL INTERNATIONAL
PRIVATE LIMITED, an Indian company,
17

18 Plaintiffs,

19 v.

20 BNP PARIBAS, a French corporation, BNP
PARIBAS SECURITIES (ASIA) LIMITED, a
21 Hong Kong company, and PRAVEEN
CHAKRAVARTY, an individual,
22

23 Defendants.
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No. C-07-6198 MHP

Action Filed: December 6, 2007

STIPULATED REQUEST FOR ORDER
EXTENDING DISCOVERY DEADLINES
AND TRIAL DATE AND ~~PROPOSED~~
ORDER (L.R. 6-2)

Proposed Trial Date: August 17, 2010

Pursuant to Civil Local Rule 6-2, IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that, if the Court approves, the current discovery deadlines in the above-captioned case be extended as set forth below. The stipulation is based on the following:

On November 23, 2009, the Court held a discovery hearing and directed the parties to meet and confer on various discovery matters.

The parties have met and have made substantial progress towards resolving their outstanding discovery disputes. To permit the completion of discovery, the parties have agreed to further extend the discovery deadlines and trial date.

The current schedule has been set in a series of agreements and court orders. On November 18, 2008, the parties in the above-captioned action filed a Discovery Plan pursuant to Federal Rule of Civil Procedure 26(f) setting forth, among other things, discovery deadlines. On February 9, 2009, the parties appeared for a Status Conference and the Court issued Amended Civil Minutes setting discovery deadlines and a trial date. On June 12, 2009, the Court entered an Order granting the stipulated request of the parties to reset the discovery deadlines and trial date in the above-captioned action. On October 5, 2009, the Court entered an Order granting the stipulated request of the parties to reset the discovery deadlines and trial date in the above-captioned action.

The parties seek Court approval to further extend the discovery deadlines as follows:

1. The deadline for depositions shall be extended to January 22, 2010 for the following purposes: (a) to depose Plaintiffs' Rule 30(b)(6) representative(s); (b) to complete the deposition of Thomas Weisel; and (c) to complete the deposition of Ted Smarz, if necessary. The parties agree to complete their productions of documents relevant to these depositions at least 10 days prior to these depositions.

2. The deadlines set herein for depositions shall not preclude Plaintiffs from seeking an order from the Court to take a 30(b)(6) deposition of the BNPP Defendants on the subject of preservation of evidence, including tape recordings, or Defendants from objecting to issuance of such an order on any grounds, including untimeliness and lack of necessity.

3. The deadline for exchanging expert reports shall be extended from December 9, 2009 to February 22, 2010.

4. The deadline for exchanging expert rebuttal reports shall be extended from January 11, 2010 to March 22, 2010.

5. The discovery cutoff shall be extended from January 29, 2010 to April 30, 2010.

6. The deadline to hear dispositive motions shall be extended from March 15, 2010 to June 14, 2010.

7. The trial date shall be moved from May 11, 2010 to August 17, 2010.

The parties respectfully request that the Court grant their request.

In accordance with general Order No. 45, Section X, the filer of this document hereby attests that concurrence in the filing of this document has been obtained from each of the signatories listed below.

DATED: December 23, 2009.

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Attorneys for Defendant PRAVEEN CHAKRAVARTY

ORDER

Pursuant to stipulation, the foregoing is approved and IT IS SO ORDERED.

January 4, 2010

DATED: ~~December __, 2009~~

HOWARD
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